

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>JING HE</b>	<b>:</b>	<b>VIOLATION:</b>
	<b>:</b>	<b>18 U.S.C. § 1832(a)(2) &amp; (a)(4) (theft and attempted theft of trade secrets)</b>
		<b>18 U.S.C. § 1834 (notice of forfeiture)</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

Between in or about September 2008 through on or about February 27, 2009, in the Eastern District of Pennsylvania and elsewhere, defendant

**JING HE,**

with the intent to convert a trade secret to the economic benefit of someone other than the owner of the trade secret, and intending and knowing that the offense would injure the owner of the trade secret, knowingly copied, duplicated, and downloaded, and attempted to do so, without authorization, such trade secret, that is technical, scientific, and engineering information for medical imaging and hospital administration software, which was produced for and placed in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1832(a)(2) and (a)(4).

**NOTICE OF FORFEITURE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

As a result of the violation of Title 18, United States Code, Sections 1832(a)(2) and (a)(4), set forth in this information, defendant

**JING HE**

shall forfeit to the United States of America property used to commit or facilitate the charged offense, including, but not limited to:

computer equipment used in the offense.

All pursuant to Title 18, United States Code, Section 1834, and Title 18, United States Code, Sections 2323(a)(1)(B) and (b).

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**MICHAEL L. LEVY**  
**UNITED STATES ATTORNEY**